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NATTO IYELA GBARABE, et al.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATTO IYELA GBARABE, et al.,
Plaintiffs,
v.
CHEVRON CORPORATION,
Defendant.

Case No. 14-cv-00173-SC

**STIPULATION AND PROPOSED
ORDER RE DISCOVERY DIRECTED
TO NEW PLAINTIFFS IN THE
THIRD AMENDED COMPLAINT**

WHEREAS, defendant served the plaintiffs named in the Second Amended Complaint with one Set of Interrogatories and a First Set of Requests for Production, both dated February 17, 2015 and a Second Set of Requests for Production, dated February 27, 2015 (hereafter the “Discovery”);

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1 WHEREAS, the Third Amended Complaint filed on June 1, 2015, among other things,
2 lists 11 additional plaintiffs whom plaintiffs' counsel contend were "drawn from the existing
3 plaintiffs in this case;"

4 WHEREAS, plaintiffs' counsel offered that they would treat the Discovery as if it were
5 served on those 11 persons on June 1, 2015, without the need for defendant to re-serve the
6 Discovery, and defendant accepted that offer without prejudice to its response to the Third
7 Amended Complaint and without conceding its propriety,

8 Now, therefore, the parties hereby stipulate as follows:

9 1. The Discovery identified above shall be deemed served as of June 1, 2015, on the 11
10 individuals referred to above.

11 2. This is without prejudice to defendant's rights and remedies with respect to filing of
12 the Third Amended Complaint and without prejudice to plaintiffs' position that the 11 plaintiffs
13 were named pursuant to stipulation dated March 15, 2015.

14 Pursuant to Local Rule 5-1(i)(3), I, Robert A. Mittelstaedt, attest that concurrence in filing
15 this document has been obtained from the other signatory.

16 Dated: June 18, 2015

Jones Day

17
18 By: /s/ Robert A. Mittelstaedt
Robert A. Mittelstaedt

19 Counsel for Defendant
20 CHEVRON CORPORATION

21 Dated: June 18, 2015

Rufus-Isaacs, Acland & Grantham LLP

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23 By: /s/ Jacqueline Perry
Jacqueline Perry

24 Counsel for Plaintiffs
25 NATTO IYELA GBARABE, et al.
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[~~PROPOSED~~] ORDER

PURSUANT TO THIS STIPULATION, IT IS SO ORDERED.

Dated: June 23, 2015



The Honorable Samuel Conti

NAI-1500377837